<div align="center">RESPONSE/ARGUMENTS</div>

Claims 1-20 are pending in this application.

Claim 15 has been amended to correct a typographical error.

Objections

The Office Action objected to Claim 5. It is assumed that the Office Action was actually referring to Claim 15. Claim 15 has been amended to correct typographical error, "on" has been replaced with "one."

Rejections under 35 U.S.C. § 102

Claims 1-10 and 12-20 are rejected under 35 U.S.C. 102(e) as being anticipated by Brooks et al. US 2003/0210139 A1 (Brooks) (now abandoned).

As an initial matter, it is noted that Brooks teaches a method for evaluating a security system in place at a facility and describes in general terms a security system similar to that shown in Applicants' FIG. 1 (PRIOR ART).

It is noted that the Office has not identified where in Brooks an alleged anticipatory teaching of the features of claim 1 are to be found. The Office Action contends that Brooks teaches the feature of "a network security controller" of independent claim 1. (Office Action, page 2). This contention is respectfully traversed. Paragraph [0038] of Brooks describing sensor processing equipment and cited by the Office Action in support of the contention that Brooks teaches the subject feature of "a network security controller," however Brooks is silent as to the subject feature.

The Office Action contends that Brooks teaches the feature of "a relational database including portal objects" of independent claim 1. (Office Action, page 3). This contention is respectfully traversed. Paragraph [0031] of Brooks describes a database for evaluating a security rating and is cited by the Office Action in support of the contention that Brooks teaches the

subject feature of "a relational database including portal objects," whereas Brooks is silent as to the subject feature.

The Office Action contends that Brooks teaches the feature of "network node comprising … a local database coupled to the network;… an event generator coupled to the local database   …a finite state portal controller" of independent claim 1. (Office Action, page 3). This contention is respectfully traversed.   The Office Action does not identify where Brooks discloses a "network node," and none of the Figures in Brooks suggest a network node.

The Office Action contends that Brooks teaches the feature of "a local database" of independent claim 1. (Office Action, page 3). This contention is respectfully traversed.   The Office Action refers to the same paragraph, Paragraph [0031] of Brooks discussed above. Claim 1 includes two distinct databases, and neither one is described or suggested by Brooks.

Paragraph [0037] of Brooks commenting on detecting physical events is cited by the Office Action in support of the contention that Brooks teaches the subject feature of "an event generator coupled to the local database."   Brooks is silent as to the subject feature. Still further, one of ordinary skill in the art would not equate detecting physical events with generating events for a finite state machine (a finite state portal controller). Thus, for at least this reason, Brooks cannot anticipate independent claim 1.

Additionally, paragraph [0046] of Brooks describing time stamps is cited by the Office Action in support of the contention that Brooks teaches the subject feature of "a finite state portal controller," this paragraph 0 is silent as to the subject feature. Still further, Applicants have carefully reviewed the remainder of the Brooks application, and find no teaching of "a finite state portal." A "finite state portal controller" is defined in Applicants specification at page 6 lines 24-29. Thus, for at least this reason, Brooks cannot anticipate independent claim 1.

Applicants respectfully submit that Claim 1 is not anticipated by Brooks, since Brooks does not disclose a **network security controller**, a **relational database including portal objects**, a **network node** comprising … **a local database** coupled to the network;… an

event generator coupled to the local database   …a **finite state portal controller** as set forth in claim 1. (Emphasis Added). Accordingly, favorable reconsideration and withdrawal of the rejection of independent claim 1 under 35 U.S.C. §102 are respectfully requested. In the event that the Office maintains the rejection of independent claim 1 under 35 U.S.C. §102, Applicant respectfully requests that the Office, in the interests of compact prosecution, identify on the record and with specificity sufficient to support a prima facie case of anticipation, where in the Brooks patent the subject features of independent claim 1 are alleged to be taught.

Applicants respectfully submit that the protocol normalizer as recited in claim 2 is not suggested in Brooks paragraph [0032] which describes normalizing security ratings. The Applicants' protocol normalizer "processes the converted data stream using a mapping function in conjunction with the local database 176. The mapping function detects and processes state changes. The state changes are transformed into portal events which are subsequently processed by the finite state portal controller 162." (Specification page 17 line 28 – page 18 line 2). For similar reasons, claim 3 is not anticipated by Brooks.

As Claims 4-6 depend from allowable Claim 1 and cite additional structure, they too are allowable for analogous reasons.

The Office Action contends that Brooks teaches the feature "node local database downloads an extensible markup language representation of the predetermined resource information" as recited in dependent claim 7. (Office Action, page 4). This contention is respectfully traversed. The Office Action refers to Paragraph [0035] of Brooks discussed above. Claim 7 includes a local database which is neither described nor suggested by Brooks.

As claims 8 -10 depend from allowable claim 1 and cite additional structure, they too are allowable for analogous reasons.

Applicants believe that the cited references do not anticipate or render obvious the claimed invention and respectfully request that the Examiner reconsider and withdraw the

rejections of claims 1-10.

The Office Action contends that Brooks teaches a method to normalize an access control event as recited in claim 12. Brooks paragraph [0032] describes normalizing security ratings and is not related to steps of "converting a field device signal representing the access control event to a data stream" or "normalizing the data stream to provide at least one portal event" as recited in claim 12. Paragraph [0037] of Brooks commenting on photo badges and simple anti-passback features is cited by the Office Action in support of the contention that Brooks teaches "processing the at least one portal event in a finite state portal controller to provide at least one of a local action and a global event." Brooks is silent as to processing at least one portal event in a finite state portal controller. The prior art security system described by Brooks has a completely different network architecture (compare Applicants' prior art Fig. 1 and Applicants' Fig. 2), therefore the prior art system described by Brooks does not suggest or teach any of the steps occurring on a network node including steps involving local actions. Thus, for at least this reason, Brooks cannot anticipate independent claim 12.

The office action contends that Brooks discloses the method of claim 13 in paragraphs [0031] and [0032]. In these paragraphs Brooks describes a database for evaluating a security rating and normalizing security ratings. Applicants respectfully submit that Brooks is silent as to "storing predetermined resource information from at least one resource table of a relational database **in a local database; and… mapping the field device signal to the at least one portal event using the stored predetermined resource information**," and therefore Brooks does not anticipate claim 13.

As described above, Paragraph [0044] of Brooks describes operation of an anti-passback feature and does not disclose "detecting a state change in the field device signal to provide a portal event; and translating the field device signal to provide a portal event" as recited in claim 15, and therefore Brooks does not anticipate claim 15.

As described above, Brooks does not teach the feature of "processing the at least one

portal event in a **finite state portal controller**" as recited in claim 17. Therefore, claim 17 is not anticipated by Brooks.

In paragraphs [0039-0046] Brooks describes standard features of prior art security systems and is cited by the Office Action in support of the contention that Brooks teaches the features of claim 20. This contention is respectfully traversed. As described above the prior art security system described by Brooks has a completely different network architecture, therefore the prior art system described by Brooks does not describe the steps of:

receiving a command;
mapping the command using the predetermined resource information to provide a command portal event;
processing the command portal event in the finite state portal controller to provide at least one local action; and
converting the local action into a local action field device signal directed to a selected application extension" which occur on a network node a feature not taught or suggested by Brooks. Therefore, claim 20 is not anticipated by Brooks.

As Claims 14, 16, 18 and 19 depend from allowable Claim 12 and cite additional features, they too are allowable for analogous reasons.

Based on the preceding remarks, Applicants respectfully request reconsideration and withdrawal of the anticipatory rejections.

Rejections under 35 U.S.C. § 103(a)

Claim 11 is rejected under 35 U.S.C. 103(a) as being unpatentable over Brooks in view of Elwahab et al. patent application publication US 2001/0034754 (Elwahab).

Applicants submit that neither Brooks nor Elwahab discloses at least the aforementioned features of independent claim 1. In particular, it is submitted that secondary citation to Elwahab does not remedy the deficiencies in the primary citation to Brooks. Accordingly, without conceding the propriety of the asserted combination, the asserted combination of Brooks and Elwahab is likewise deficient, even in view of the knowledge of one of ordinary skill in the art. In particular, Elwahab does not disclose a network security controller, a relational database

including portal objects, a network node comprising ... a local database coupled to the network;... an event generator coupled to the local database ...a finite state portal controller as set forth in claim 1.

Since neither Brooks nor Elwahab disclose or teach all of the limitations of the claimed invention in independent claim 1, Applicants believe that the cited references do not anticipate or render obvious the claimed invention and respectfully request that the Examiner reconsider and withdraw the rejections of claim 11 depending from claim 1.

CONCLUSION

In summary, the above-identified patent application has been amended and reconsideration is respectfully requested for all the reasons set forth above.

Respectfully submitted,
S2 Security Corporation

/Barry Gaiman/
Barry Gaiman
Registration No. 42,562
Attorney for Applicants

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S2 Security Corporation
50 Speen Street
Framingham, MA 01701
Telephone: (508) 663-2426
Facsimile: (508) 663-2512
e-mail: bgaiman@s2sys.com

BG/pc